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IN THE UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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16
17 MARGO PERRYMAN individually, and for
other persons similarly situated,

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Plaintiff,

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vs.

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LITTON LOAN SERVICING, LP; OCWEN
LOAN SERVICING LLC; SOUTHWEST
BUSINESS CORPORATION; AMERICAN
SECURITY INSURANCE COMPANY;
AMERICAN MODERN HOME
INSURANCE COMPANY; ALTISOURCE
PORTFOLIO SOLUTIONS, S.A., BELTLINE
ROAD INSURANCE AGENCY, INC.; and
DOES 4-100,

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Defendants.

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Case No.: 3:14-cv-02261-JST

**STIPULATION TO MODIFY BRIEFING
SCHEDULE FOR DEFENDANT OCWEN
LOAN SERVICING LLC'S MOTION FOR
STAY AS TO CLAIMS AGAINST IT;
[PROPOSED] ORDER**

Civil Local Rule 6-2

1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Plaintiff Margo Perryman (“Plaintiff”) and
2 Defendant Ocwen Loan Servicing, LLC (“Ocwen”), through their respective attorneys, stipulate as
3 follows:

4 WHEREAS, on November 21, 2014, Ocwen filed and served its Motion for Stay as to
5 Claims Against It [Docket Entry No. 135] (“Motion”);

6 WHEREAS, Ocwen’s Motion is based on a proposed settlement in the matter of Lee v.
7 Ocwen Loan Servicing, LLC, et al. (S.D. Fla.);

8 WHEREAS, Plaintiff and Ocwen previously stipulated to a briefing schedule that would
9 allow Plaintiff to have access to the Lee settlement agreement for at least one week before being
10 required to file her response to the Motion, which was approved by the Court on November 26,
11 2014, and again on December 8, 2014 [Docket Entry Nos. 139, 142];

12 WHEREAS, Plaintiff’s current deadline to file her response to Ocwen’s Motion is January
13 8, 2015, the current deadline for Ocwen to file its Reply is January 15, 2015, and the hearing date
14 for Ocwen’s Motion is February 5, 2015 [Docket Entry Nos. 142, 147];

15 WHEREAS, Plaintiff requires a five day extension of time to file her response to Ocwen’s
16 Motion, due to an unanticipated medical situation requiring the care of a family member that arose
17 after the parties entered into the December 8, 2014 stipulation [Docket Entry No. 142]; and

18 WHEREAS, this stipulation only applies to the briefing schedule and hearing date for
19 Ocwen’s Motion to Stay and will not impact any other dates or deadlines that have been set by the
20 Court;

21 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to
22 the Court’s approval, the following briefing schedule for Ocwen’s Motion to Stay shall apply:

- 23 • Plaintiff’s deadline to file her response to Ocwen’s Motion to Stay shall be
24 extended from January 8, 2015 to January 13, 2015;
25 • Ocwen’s deadline to file its reply in support of its Motion to Stay shall be extended
26 from January 15, 2015 to January 20, 2015; and
27 • The hearing date on the Motion to Stay shall remain set for February 5, 2015.
28

1 DATED: January 2, 2015

LAW OFFICE OF SHERI L. KELLY
Sheri L. Kelly

3 By: /s/ Sheri L. Kelly
4 Sheri L. Kelly
5 Attorneys for Plaintiff
6 MARGO PERRYMAN

7 DATED: January 2, 2015

HUNTON & WILLIAMS LLP
Brian V. Otero
Stephen Blacklocks
Ryan A. Becker
Jason J. Kim

10 By: /s/ Jason J. Kim
11 Attorneys for Defendants
12 OCWEN LOAN SERVICING LLC and
13 LITTON LOAN SERVICING, LP

14 **FILER'S ATTESTATION**

15 I, Sheri L. Kelly, attest, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the filing of
16 this document has been obtained from the other signatory to this document.

18 DATED: January 2, 2015

LAW OFFICE OF SHERI L. KELLY
Sheri L. Kelly

20 By: /s/ Sheri L. Kelly
21 Sheri L. Kelly
22 Attorneys for Plaintiff
23 MARGO PERRYMAN

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

- 2 • Plaintiff's deadline to file her response to Ocwen's Motion to Stay shall be
3 extended from January 8, 2015 to January 13, 2015;
4 • Ocwen's deadline to file its reply in support of its Motion to Stay shall be extended
5 from January 15, 2015 to January 20, 2015; and
6 • The hearing date on the Motion to Stay shall remain set for February 5, 2015.

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8 Dated: January 5, 2015
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DECLARATION OF SHERI L. KELLY

I, Sheri L. Kelly, declare as follows:

1. I am counsel of record for Plaintiff Margo Perryman in this matter. I have personal knowledge of the matters set forth herein, and if called upon to do so, could and would testify competently thereto. I submit this declaration in support of Plaintiff Margo Perryman (“Plaintiff”) and Ocwen’s Further Stipulation Pursuant to Civil L.R. 6-2 to Modify Briefing Schedule on Ocwen’s Motion for Stay as to Claims Against It (the “Stipulation”).

2. As set forth in the Stipulation, Plaintiff and Ocwen have stipulated to the following briefing schedule for Ocwen’s Motion for Stay as to Claims Against It (“Motion to Stay”):

- Plaintiff's deadline to file her response to Ocwen's Motion to Stay shall be extended from January 8, 2015 to January 13, 2015;
 - Ocwen's deadline to file its reply in support of its Motion to Stay shall be extended from January 15, 2015 to January 20, 2015; and
 - The hearing date on the Motion to Stay shall remain set for February 5, 2015.

15 3. Plaintiff and Ocwen previously stipulated to a briefing schedule that would allow
16 Plaintiff to have access to the settlement agreement in Lee v. Ocwen Loan Servicing, LLC, et al.
17 (S.D. Fla.) for at least one week before being required to file her response to the Motion to Stay,
18 which was approved by the Court. Docket Entry Nos. 139, 142.

19 4. Plaintiff requires a five day extension to file her response to Ocwen's Motion to
20 Stay due to an unanticipated medical situation requiring the care of a family member.

21 5. Defendants Ocwen, Litton Loan Servicing, LP and Southwest Business
22 Corporation each have obtained extensions of time in which to respond to Plaintiff's complaint via
23 stipulation. Docket Entry Nos. 24, 30, 41, 111. Defendant Beltline Road Insurance Agency, Inc.
24 sought and obtained an order extending the time in which it may respond to Plaintiff's complaint,
25 and Plaintiff and Beltline obtained extensions to file their respective response and reply. Docket
26 Entry Nos. 119, 134, 148.

6. Pursuant to Local Rule 6-2(a)(3), the schedule proposed in the Stipulation will only affect the briefing schedule for Ocwen's Motion to Stay and will not affect the hearing date, or any other dates or deadlines that have been set by the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 2, 2015, at San Jose, California.

By: /s/ Sheri L. Kelly
Sheri L. Kelly